

Carolyn H. Cottrell (SBN 166977)
Ori Edelstein (SBN 268145)
Michelle S. Lim (SBN 315691)
SCHNEIDER WALLACE
COTTRELL KONECKY
WOTKYNS LLP
2000 Powell Street, Suite 1400
Emeryville, California 94608
Telephone: (415) 421-7100
Facsimile: (415) 421-7105
ccottrell@schneiderwallace.com
oedelstein@schneiderwallace.com
mlim@schneiderwallace.com

Sarah R. Schalman-Bergen (admitted *pro hac vice*)
Krysten L. Connor (admitted *pro hac vice*)
BERGER MONTAGUE PC
1818 Market Street, Suite 3600
Philadelphia, Pennsylvania 19103
Telephone: (215) 875-3000
Facsimile: (215) 875-4604
Sschalman-bergen@bm.net
KConnon@bm.net

Attorneys for Plaintiff, the Collective,
and putative Class, and Aggrieved Employees on
behalf of the State of California

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

PAUL MONPLAISIR, on behalf of himself
and all others similarly situated,

Plaintiffs,

vs.

INTEGRATED TECH GROUP, LLC and
ITG COMMUNICATIONS LLC,

Defendants.

Case No. 3:19-cv-01484-WHA

**NOTICE OF FILING OF CONSENTS TO
JOIN COLLECTIVE ACTION**

Judge: Hon. William Alsup

Complaint Filed: March 21, 2019

Trial Date: October 19, 2020

NOTICE OF FILING CONSENTS TO JOIN COLLECTIVE ACTION

Plaintiff Paul Monplaisir, individually and on behalf of all persons similarly situated, hereby files the following Opt-In Consent Forms, submitted herewith as Exhibits 1 through 8, pursuant to the Fair Labor Standards, Act, 29 U.S.C. §§ 201, *et seq.*

CONSENTS TO JOIN COLLECTIVE ACTION

EXHIBIT NUMBER	NAME	OPT-IN NUMBER
1	Nnamdi A. Obiesie	160
2	Abraham De La Cruz	161
3	Brandon Chestnut	162
4	Christopher Dewar	163
5	Jim Bermejo	164
6	Joseph Alfred	165
7	Omar Batista Ricardo	166
8	William Smith	167

Date: November 6, 2019

Respectfully submitted,

/s/ Michelle S. Lim

Carolyn H. Cottrell

Ori Edelstein

Michelle S. Lim

SCHNEIDER WALLACE

COTTRELL KONECKY

WOTKYNs LLP

Sarah R. Schalman-Bergen (admitted *pro hac vice*)

Krysten L. Connor (admitted *pro hac vice*)

BERGER & MONTAGUE, P.C.

Attorneys for Plaintiff, the Collective,
and putative Class, and Aggrieved Employees on behalf
of the State of California

CERTIFICATE OF SERVICE

I hereby certify that on November 6, 2019, I electronically filed the foregoing document with the Clerk of the Court using the Court's CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants.

Date: November 6, 2019

Respectfully submitted,

/s/ Michelle S. Lim

Carolyn H. Cottrell

Ori Edelstein

Michelle S. Lim

SCHNEIDER WALLACE

COTTRELL KONECKY

WOTKYNs LLP

Sarah R. Schalman-Bergen (admitted *pro hac vice*)

Krysten L. Connor (admitted *pro hac vice*)

BÉRGER & MONTAGUE, P.C.

Attorneys for Plaintiff, the Collective,
and putative Class, and Aggrieved Employees on behalf
of the State of California

EXHIBIT 1

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 04 2019

Name:

Nnamdi A Obiesie (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Hialeah Florida from on or about (start date) 9/19/17 to on or about (end date) 12/1/17.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10/22/19 (Date Signed)

Nnamdi Obiesie (Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 2

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 04 2019

Name:

Abraham De LA Cruz (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) 10101 NW 79AVE, MIAMI LAKES, FL. from on or about (start date) MAY / 2017 to on or about (end date) August / 2017
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10/22/2019

(Date Signed)



(Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 3

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 04 2019

Name:

Brandon Chestnut (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Jacksonville, FL from on or about (start date) Jan 1 2016 to on or about (end date) Feb, 2017.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

Oct 30 2019

(Date Signed)

[Signature]

(Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 4

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 04 2019

Name: Christopher Dewar (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Pittsburgh Pennsylvania from on or about (start date) Nov 2018 to on or about (end date) Dec 2018.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10/29/2019 (Date Signed)

[Signature] (Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 5

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 04 2019

Name:

Jim Bermejo (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) South San Francisco, CA from on or about (start date) 10/18 to on or about (end date) present.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10.28.19 (Date Signed)

Jim Bermejo (Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 6

OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 04 2019

Name: Joseph.A (Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) _____ from _____ on _____ or about (start date) _____ to on or about (end date) _____.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

<u>10/20/19</u> (Date Signed)	<u>Joseph Alfred</u> (Signature)
-------------------------------	----------------------------------

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 7

OPT-IN CONSENT FORM

NOV 04 2019

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC

Case No. 3:19-cv-01484-WHA

United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

Name:

Omar Batista Ricardolo
(Please Print)

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Miami
Florida from on or about (start date) 2016 Septiembere to on or about (end date) 05-08-18.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

10-23-2019

(Date Signed)

(Signature)

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.

EXHIBIT 8

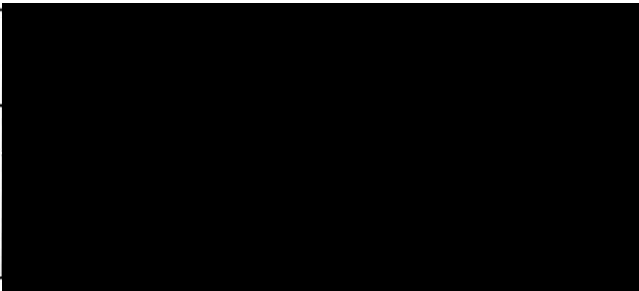
OPT-IN CONSENT FORM

Monplaisir, et al. v. Integrated Tech Group, LLC and ITG Communications LLC
Case No. 3:19-cv-01484-WHA
United States District Court, Northern District of California

Complete And Submit To:

ITG FLSA Litigation
c/o JND Legal Administration
PO Box 91300
Seattle, WA 98111

NOV 04 2019

Name: <u>William Smith</u> (Please Print)	
Address:	

CONSENT TO JOIN COLLECTIVE ACTION

Pursuant to the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.*

1. I consent and agree to pursue my claims relating to and arising from Defendants Integrated Tech Group, LLC's and ITG Communications LLC's ("ITG") alleged violations of the Fair Labor Standards Act, 29 U.S.C. §§ 201, *et seq.* in connection with the above-referenced litigation.
2. I have worked for ITG as a Technician or similarly titled position in (city, state) Jacksonville, Florida from on or about (start date) June 2015 to on or about (end date) Nov 2018.
3. I understand that this litigation is being filed as a collective action under the Fair Labor Standards Act of 1938, as amended, 29 U.S.C. §§ 201, *et seq.* I hereby consent, agree, and opt-in to become a named Plaintiff herein and be bound by any judgment of the Court or any settlement of this action.
4. I specifically authorize my attorneys, Schneider Wallace Cottrell Konecky LLP, and Berger Montague as my agents, to prosecute this lawsuit on my behalf and to negotiate a settlement of any and all claims I have against the Defendant in this litigation.

<u>10/14/19</u> (Date Signed)	<u>William Smith</u> (Signature)
-------------------------------	----------------------------------

****IMPORTANT NOTE****

Statute of Limitations concerns mandate that you return this form as soon as possible to preserve your rights.